

Appendix B-2
Request for Documents to Andrew Hamer

Defendants 3M Company and Arizant Healthcare, Inc. request that the documents described below be produced by Dr. Hamer.

Documents To Be Produced

Dr. Hamer's Background

1. Your curriculum vitae or resume.

Documents Relating to Study Initiation and Protocols, Materials, and Methods

2. Communications between and among you, A. Legg, and T. Cannon regarding the study that was described in the article titled "Do forced air patient-warming devices disrupt unidirectional downward airflow?," published in the Journal of Bone & Joint Surgery (Britain), 2012 Feb;94(2):254-6 (hereafter "Legg, Cannon, & Hamer").
3. Communications between you and A. Legg regarding the study that was described in the article titled "Forced-air patient warming blankets disrupt unidirectional airflow" in the Bone & Joint Journal, 2013 Mar.; 95-B(3):407-10 (hereafter "Legg & Hamer").
4. Communications between and among you and A. Legg on the subject of funding for the study described in Legg & Hamer.
5. Communications between and among you, A. Legg, and T. Cannon on the subject of funding for the study described in Legg, Cannon, & Hamer.
6. Communications between you and A. Legg on the subject of obtaining patient warming devices for the study described in Legg & Hamer.
7. Communications between and among you, A. Legg, and T. Cannon on the subject of obtaining patient warming devices for the study described in Legg, Cannon, & Hamer.
8. Communications between you and A. Legg on the subject of the design of the study described in Legg & Hamer.
9. Communications between and among and you, A. Legg, and T. Cannon on the subject of the design of the study described in Legg, Cannon, & Hamer.
10. Communications between you and Scott Augustine on the subject of the design of the study described in Legg & Hamer.
11. Communications between you and Scott Augustine on the subject of the design of the study described in Legg, Cannon, & Hamer.

12. Communications between you and Augustine Biomedical + Design on the subject of the design of the study described in Legg & Hamer.
13. Communications between you and Augustine Biomedical + Design on the subject of the design of the study described in Legg, Cannon, & Hamer.
14. Communications between you and Augustine Temperature Management LLC on the subject of the design of the study described in Legg & Hamer.
15. Communications between you and Augustine Temperature Management LLC on the subject of the design of the study described in Legg, Cannon, & Hamer.
16. Communications between you and Scott Augustine on the subject of funding of the study described in Legg & Hamer.
17. Communications between you and Scott Augustine on the subject of funding of the study described in Legg, Cannon, & Hamer.
18. Communications between you and Augustine Biomedical + Design on the subject of funding of the study described in Legg & Hamer.
19. Communications between you and Augustine Biomedical + Design on the subject of funding of the study described in Legg, Cannon, & Hamer.
20. Communications between you and Augustine Temperature Management LLC on the subject of funding of the study described in Legg & Hamer.
21. Communications between you and Augustine Temperature Management LLC on the subject of funding of the study described in Legg, Cannon, & Hamer.
22. Communications between you and Scott Augustine regarding the implementation of the study described in Legg & Hamer.
23. Communications between you and Scott Augustine regarding the implementation of the study described in Legg, Cannon, & Hamer.
24. Communications between you and Augustine Biomedical + Design regarding the implementation of the study described in Legg & Hamer.
25. Communications between you and Augustine Biomedical + Design regarding the implementation of the study described in Legg, Cannon, & Hamer.
26. Communications between you and Augustine Temperature Management LLC regarding the implementation of the study described in Legg & Hamer.

27. Communications between you and Augustine Temperature Management LLC regarding the implementation of the study described in Legg, Cannon, & Hamer.
28. Communications between you and Northern General Hospital, Sheffield, UK regarding the study described in Legg & Hamer.
29. Communications between you and Northern General Hospital, Sheffield, UK regarding the study described in Legg, Cannon, & Hamer.
30. Model and serial numbers for the patient warming devices used in the study described in Legg & Hamer.
31. Model and serial numbers for the patient warming devices used in the study described in Legg, Cannon, & Hamer.
32. Specifications of the ventilation system for the operating room used in the study described in Legg & Hamer.
33. Specifications of the ventilation system for the operating room used in the study described in Legg, Cannon, & Hamer.
34. Specifications, instructions for use, and calibration records for the particle counter used in the study described in Legg & Hamer.
35. Specifications, instructions for use, and calibration records for the particle counter used in the study described in Legg, Cannon, & Hamer.
36. Specifications and instructions for use of the bubble generator used in the study described in Legg & Hamer.
37. Draft protocols for the study described in Legg & Hamer, including but not limited to the arrangement of the patient, draping, lights, and personnel.
38. Draft protocols for the study described in Legg, Cannon, & Hamer, including but not limited to the arrangement of the patient, draping, lights, and personnel.
39. Final protocols for the study described in Legg & Hamer, including but not limited to the arrangement of the patient, draping, lights, and personnel.
40. Final protocols for the study described in Legg, Cannon, & Hamer, including but not limited to the arrangement of the patient, draping, lights, and personnel.
41. Patient warming protocols and warming technologies employed at the Northern General Hospital, Sheffield, UK from 2008 to the present.

42. Orthopaedic infection rates at the Northern General Hospital, Sheffield, UK from 2008 to the present.

Data from and Results of the Studies

43. All raw data generated during the implementation of the study described in Legg & Hamer.
44. All raw data generated during the implementation of the study described in Legg, Cannon, & Hamer.
45. All results from the statistical analysis of raw data from the study described in Legg & Hamer.
46. All results from the statistical analysis of raw data from the study described in Legg, Cannon, & Hamer.
47. Photographs, including time-lapse photography, taken during the implementation of the study described in Legg & Hamer.
48. Photographs, including time-lapse photography, taken during the implementation of the study described in Legg, Cannon, & Hamer.
49. Video or audio recordings made during the implementation of the study described in Legg & Hamer.
50. Video or audio recordings made during the implementation of the study described in Legg, Cannon, & Hamer.
51. Communications between you and A. Legg regarding the results of the study described in Legg & Hamer.
52. Communications between and among you and the other authors of Legg, Cannon, & Hamer regarding the results of the study described in Legg, Cannon, & Hamer.
53. Communications between you and Scott Augustine regarding the results of the study described in Legg & Hamer.
54. Communications between you and Scott Augustine regarding the results of the study described in Legg, Cannon, & Hamer.
55. Communications between you and Augustine Biomedical + Design regarding the results of the study described in Legg & Hamer.
56. Communications between you and Augustine Biomedical + Design regarding the results of the study described in Legg, Cannon, & Hamer.

- 57. Communications between you and Augustine Temperature Management LLC regarding the results of the study described in Legg & Hamer.
- 58. Communications between you and Augustine Temperature Management LLC regarding the results of the study described in Legg, Cannon, & Hamer.

Study Publication

- 59. All pre-publication drafts and manuscripts of Legg & Hamer.
- 60. All pre-publication drafts and manuscripts of Legg, Cannon, & Hamer.
- 61. Communications between you and A. Legg regarding the drafting of Legg & Hamer.
- 62. Communications between and among you and the other authors of Legg, Cannon, & Hamer regarding the drafting of Legg, Cannon, & Hamer.
- 63. Communications between you and Scott Augustine regarding the drafting of Legg & Hamer.
- 64. Communications between you and Scott Augustine regarding the drafting of Legg, Cannon, & Hamer.
- 65. All communications from reviewers of Legg & Hamer regarding Legg & Hamer.
- 66. All communications from reviewers of Legg, Cannon, & Hamer regarding Legg, Cannon, & Hamer.

Documents Relating to Consulting Fees (If Any) Received From Scott Augustine, Augustine Biomedical + Design, and/or Augustine Temperature Management LLC

- 67. Records of consulting fees, expense reimbursement, and other compensation paid to you by Scott Augustine.
- 68. Records of consulting fees, expense reimbursement, and other compensation paid to you by Augustine Biomedical + Design.
- 69. Records of consulting fees, expense reimbursement, and other compensation paid to you by Augustine Temperature Management LLC.

Communications with Counsel

- 70. Communications or correspondence between you and any lawyer or solicitor representing 3M in connection with the subject litigation pending in the United States.

71. Communications or correspondence between you and any lawyer or solicitor representing any plaintiff in connection with the subject litigation pending in the United States.